

U.S. Department
of Transportation

United States
Coast Guard



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OCT 26 1995

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: IMPLEMENTATION POLICY RELATING TO THE INSPECTION OF
SEAGOING BARGES

Ref: (a) Title 46 U. S. Code, Section 3302(m)

1. The following policy provides a definition of "bulk" as used in paragraph (2) of reference (a). It is intended to standardize D8 enforcement of reference (a) and bring about inspection work load reductions anticipated by that law.

2. Effective immediately, "bulk" as used in paragraph (2) of reference (a) will mean quantities greater than 250 barrels (10,500 gallons). Therefore, D8 units shall not inspect unmanned seagoing barges that carry less than 250 barrels of non-cargo flammable/combustible liquids, including oils. This includes all oils such as fuel and lubricating oils for on board equipment. Additionally, owners of barges that qualify for the inspection exemption in reference (a) shall not be given an inspection unless they can show that the vessel has carried a non-exempted cargo within the past two years, or that they currently have a contract to carry these cargoes.

3. HISTORY: Reference (a) was created by the 1993 Coast Guard Authorization act to grant inspection exemptions to seagoing unmanned barges that do not carry a hazardous material as cargo; or a flammable or combustible liquid, including oil, in bulk. It was anticipated that this amendment would decrease the Coast Guard's inspection work load by exempting many low risk unmanned barges. This work load reduction has not been realized for several reasons. First, a barge carrying any quantity of flammable or combustible liquid, including oil, as cargo is disqualified for carrying a hazardous material (46 USC 2101(14)). Secondly, various Coast Guard interpretations of "bulk", as it relates to the carriage of non-cargo oils including lubricating and fuel oil for on board equipment, have varied the exemption thresholds from one quart to 110 gallons. Finally, the absence of policy to deal with barge owners who desire to retain all cargo options by maintaining a current Certificate of Inspection have prevented us from applying the exemption to qualified barges.

4. Questions regarding this matter may be directed to CDR Tetreau or LT McAvoy at (504) 589-6271.

A handwritten signature in black ink, appearing to read "J. W. Calhoun".
J. W. CALHOUN
By direction

Dist: All Eights District MSOs, MSU and MSDs